

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

WITNESS/EXHIBIT LIST

Jury Trial

before Judge Michael H. Watson

beginning

January 19, 2005 and ending January 26, 2005

Ali Bahar,

Plaintiff,

v.

Case No. 1:01cv798
(Watson, J.)

City of Cincinnati,

Defendant.

Caption						Docket Number
Ali Bahar v. City of Cincinnati						1:01cv798
Plaintiff's Attorney Kelly Myers Randy Freking			Defendant's Attorney Gus Giglio Terry Nestor			Trial Date(s) 1/19-20-21-24-25
Presiding Judge Michael H. Watson			Courtroom Deputy Barbara Crum		Court Reporter Name & Date(s) Julie Weifer, (Official)	
Plf. #	Def. #	Date Shown	Offered	Admitted	Witness/Attorney	Description of Exhibits or Witnesses
PX1		1/19/05			Johnson/Freking	Application for Employment/Promotion
PX2-1		1/19/05	X	X	Johnson/Freking	City of Cincinnati Performance Report (2-1)
PX2-2		1/19/05	X	X	Johnson/Freking	" " " " (2-2)
PX2-3		1/19/05	X	X	Johnson/Freking	" " " " (2-3)
PX2-4		1/19/05	X	X	Johnson/Freking	" " " " (2-4)
PX2-5		1/19/05	X	X	Johnson/Freking	" " " " (2-5)
PX2-6		1/19/05	X	X	Johnson/Freking	" " " " (2-6)
PX2-7		1/19/05	X	X	Johnson/Freking	" " " " (2-7)
PX2-8		1/19/05	X	X	Johnson/Freking	" " " " (2-8)
PX2-9		1/19/05	X	X	Johnson/Freking	" " " " (2-9)
PX2-10		1/19/05	X	X	Johnson/Freking	" " " " 1998
		1/19/05	X	X	Johnson/Freking	1999
PX3		1/19/05			Johnson/Freking	Commendation Letters
PX6		1/19/05			Johnson/Freking	email response from Chapman to Bahar
PX7		1/20/05	X	X	Johnson/Freking	memo from Johnson to Sr. Engineering Technician
	DX 2023	1/20/05	X	X	Johnson/Freking/Nestor	11/2/99 Memo re: MSD Policy
	DX 2002	1/20/05			Johnson/Nestor	8/18/00 Memo to CSC from J. Johnson
	DX 2022	1/20/05	X	X	Johnson/Nestor	6/5/00 Memo re: Employees Working out of Classification
	DX 2098	1/20/05	X	X	Johnson/Nestor	2/7/02 Email from Johnson to Bahar + Campbell
	DX 2093	1/20/05	X	X	Johnson/Nestor	Promotion List 1/1/00 to 7/1/02 (a,b)
PX14		1/20/05	X	X	Johnson/Nestor	Job Summary
	DX 2003	1/20/05	X	X	Johnson/Freking	EIT Classification Specifications
		1/20/05			Niehaus/Freking	Niehaus Depo (Pg 49, Ln 4)/(Pg 53, Ln 16)
PX5		1/20/05	X	X	Huang/Myers	City of Cincinnati Notice of Official Reprimand
	DX 2022	1/20/05	X	X	Huang/Giglio	6/5/00 Memo re: Employees Working out of Classification
	DX 2023	1/20/05	X	X	Huang/Giglio	11/2/99 Memo re: MSD Policy
	DX 2012	1/20/05			Huang/Giglio	Reprimand of Bahar, 7/10/00

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	DX 2073	1/20/05	X	X	Huang/Giglio	3/13/00 Huang Email to Campbell
	DX 2089	1/20/05	X	X	Huang/Giglio	Staff Allocation for USEPA Response
PX 2		1/20/05			Bahar/Myers	City of Cincinnati Performance Reports
PX 4		1/20/05	X		Bahar/Myers	Handwritten calendar notes from 8/13/99
PX 5		1/20/05			Bahar/Myers	City of Cincinnati Notice of Official Reprimand
PX 6		1/20/05	X	X	Bahar/Myers	7/25/00 Email response from Chapman to Bahar
PX 11-2		1/21/05	X	X	Bahar/Myers	1/31/02 Letter from Bahar to Minges
PX 11-1		1/21/05	X	X	Bahar/Myers	1/31/02 Letter from Bahar to Minges
	DX 2036	1/21/05	X	X	Bahar/Giglio	4/23/01 Bahar Email
	DX 2018	1/21/05	X	X	Bahar/Giglio	8/24/00 Bahar Email
	DX 2005	1/21/05	X	X	Bahar/Giglio	CSC Minutes re: Bahar Appeal
	DX 2016	1/21/05	X	X	Bahar/Giglio	8/16/00 Bahar Letter to Deese
	DX 2017	1/21/05	X	X	Bahar/Giglio	8/18/00 Bahar Emails
	DX 2092	1/21/05	X	X	Bahar/Giglio	EEO Processing Form
PX 10		1/21/05	X	X	Bahar/Giglio	Bahar 2/9/01 EEOC Charge (Pg 1)
	DX 2051	1/21/05	X	X	Bahar/Giglio	Bahar EEOC Complaint
	DX 2053	1/21/05	X	X	Bahar/Giglio	Bahar EEOC Affidavit
	DX 2097	1/21/05	X	X	Bahar/Giglio	Charge of Discrimination
	DX 2054	1/21/05	X	X	Bahar/Giglio	Bahar EEOC Affidavit re: Retaliation
	DX 2059	1/21/05	X	X	Bahar/Giglio	9/7/00 Bahar E-mail re: Leadership #3
	DX 2055	1/21/05	X	X	Bahar/Giglio	2/22/01 Bahar Email
	DX 2063	1/21/05	X	X	Bahar/Giglio	8/28/00 Chapman Email to Bahar
	DX 2015	1/21/05	X	X	Bahar/Giglio	8/22/00 Chapman Memo
	DX 2037	1/21/05	X	X	Bahar/Giglio	Updated Letter from Bahar to Kierney
	DX 2049	1/21/05	X	X	Bahar/Giglio	2/9/01 Minges Memo to Bahar, Kim, St. John
	DX 2076	1/21/05	X	X	Bahar/Giglio	2/7/00 Kierney Memo to Bahar
	DX 2074	1/21/05	X	X	Campbell/Freking	4/10/00 Corr. R. Campbell to P. Kierney
		1/21/05			Campbell/Freking	Campbell Depo (Pg 70, Ln 9)
	DX 2013	1/21/05	X	X	Campbell/Freking	3/13/00 Huang Email to Campbell
	DX 2002	1/21/05			Campbell/Freking	8/18/00 Memo to CSC from Johnson
		1/21/05			Campbell/Freking	Campbell Depo (Pg 47, Ln 3)
		1/21/05			Campbell/Freking	Campbell Depo (Pg 52, Ln 16)

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Plf. #	Def. #	Date Shown	Offered	Admitted	Witness/Attorney	Description of Exhibits or Witnesses
	DX 2023	1/21/05	X	X	Campbell/Freking	8/28/00 Chapman Email to Bahar
Px7		1/24/05	X	X	Johnstone/Meyers	8/18/00 Memo to CSC
		1/24/05			Minges/Meyers/Giglio	Depo of Steven Minges (Pg 11, Ln 20)
Px7		1/24/05	X	X	Minges/Meyers	8/18/00 Memo to CSC
		1/24/05			Schneider/Freking	Depo of Peter Schneider (Pg 60, Ln 17)
	DX 2022	1/24/05	X	X	Karney/Giglio	6/5/00 Memo re: Employees Working Out of Classification
	DX 2023	1/24/05	X	X	Karney/Giglio	11/2/99 Memo re: MSD Policy
	DX 2016	1/24/05	X	X	Karney/Giglio	2/7/00 Karney Memo to Bahar
	DX 2014	1/24/05	X	X	Karney/Giglio/Freking	4/10/00 Corr. R. Campbell to P. Karney
	DX 2015	1/24/05	X	X	Karney/Giglio	8/22/00 Chapman Memo
	DX 2023	1/24/05	X	X	Karney/Giglio	8/28/00 Chapman Email to Bahar
	DX 2090	1/24/05	X	X	Karney/Giglio	8/16/01 Memo from J. Shirey to Patrick Karney
	DX 2051	1/24/05	X	X	Karney/Giglio	3/1/00 Karney Email to J. Shirey
	DX 2015	1/24/05	X	X	Karney/Freking	8/22/00 Chapman Memo
	DX 2090	1/25/05	X	X	Karney/Freking	8/16/01 Memo from J. Shirey to Patrick Karney
	DX 2075	1/25/05	X	X	Karney/Giglio	CIP No. Assessments (1-13) 6/27/00
	DX 2096	1/25/05	X	X	Karney/Giglio	CIP No. Assessments (1-32) 12/12/00
	DX 2040	1/25/05	X	X	Karney/Giglio	MSD Career Path Flow Sheet
					1/19/05	Px 2 (Pgs 1-24) exhibit offered; no objection exhibit admitted.
					1/20/05	Px 7 / DX 2023 / DX 2022 / DX 2098 / DX 2093 / DX 2013 / DX 2089 / Px 14 / Px 5 / Px 4 / Px 6 / DX 2055 these exhibits offered; no objections except Px 4, Obj.; all exhibits offered admitted except Px 4 no ruling.
					1/21/05	Px 11 / PD 10 / DX 2026 / DX 2018 / DX 2005 / DX 2016 / DX 2017 / DX 2092 / DX 2051 / DX 2053 / DX 2097 / DX 2054 / DX 2059 / DX 2055 / DX 2015 / DX 2063 / DX 2027 / DX 2049 / DX 2076 / DX 2074 these exhibits offered; no objections, all exhibits offered are admitted.

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